

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	X	
	X	
ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
	X	
DEBTOR	X	CHAPTER 11

**MOTION OF ADVANCED SOLIDS CONTROL, LLC FOR AUTHORIZATION TO  
SELL REAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND  
ENCUMBRANCES**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO  
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)  
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED  
HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE  
HELD.**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,  
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Advanced Solids Control, LLC, Debtor-in-Possession in the above styled  
and numbered Chapter 11 bankruptcy case, and files this its Motion For Authorization to Sell Real  
Property Free and Clear of All Liens, Claims and Encumbrances, and in support thereof would  
respectfully show the Court the following:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.

2. The asset proposed to be sold is real property described as 3907 N. Pat Garrett Ct., Carlsbad, NM 88220.

3. The Debtor proposes to sell the real property for the cash sales price in the amount of \$260,000.00 to Travis and Tiffany Stevens (not related to the Debtor). The sale is scheduled to close on or before January 10, 2017.

4. The Debtor believes that the proposed sales price approximates the real property's market value in the context of such a sale, and is a reasonable value based upon the asset proposed to be sold and its marketability.

5. The real property is subject to a mortgage lien to First National Bank of Beeville in the amount of \$891,701.42. There are several other real properties which secure the claim of First National Bank of Beeville. Any outstanding ad valorem taxes, including the 2016 ad valorem taxes, will be paid in full from the sale.

6. The Debtor is requesting permission to pay all reasonable closing costs, including real estate commissions (if any), directly at closing. The net proceeds from the sale will be paid to First National Bank of Beeville against the outstanding balance of its Note (partial payment).

7. The Debtor is requesting that the sale be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code. The lien of First National Bank of Beeville and the local ad valorem taxing authorities will automatically attach to the net sales proceeds based upon their pre-petition priority, and paid through closing.

8. Should the sale to Travis and Tiffany Stevens fail to close, the Debtor is requesting permission to sell the real property to any other third party for the minimum cash sales price in the amount of \$260,000.00.

9. A copy of the Contract is attached hereto as Exhibit "A".

10. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court authorize it to sell free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code the real property (3907 N. Pat Garrett Ct., Carlsbad, NM 88220) for the cash sales price in the amount of \$260,000.00 to Travis and Tiffany Stevens pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: December 12 2016.

Respectfully submitted,



WILLIAM R. DAVIS, JR.  
State Bar No. 05565500  
LANGLEY & BANACK, INC.  
745 E. Mulberry, Suite 900  
San Antonio, TX 78212  
(210) 736-6600

Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on December 12 2016, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.

  
WILLIAM R. DAVIS, JR.

Label Matrix for local noticing  
0542-5  
Case 16-52748-rbk  
Western District of Texas  
San Antonio  
Mon Dec 12 15:29:52 CST 2016

Advanced Solids Control, LLC  
5655 Bear Lane, Suite 100  
Corpus Christi, TX 78405-4407

U.S. BANKRUPTCY COURT  
615 E. HOUSTON STREET, ROOM 597  
SAN ANTONIO, TX 78205-2055

A-Terry's Plumbing Heating & AC, Inc.  
P.O. Box 9714  
Midland, TX 79708-9714

A. G. Adjustments, Ltd.  
740 Walt Whitman Rd.  
Melville, NY 11747-2212

ASK Environmental Equipment  
20504 Enfield Ave. N.  
Forest Lake, MN 55025-8135

AT&T Mobility  
P.O. Box 6463  
Carol Stream, IL 60197-6463

American Ad Valorem Tax Consultants  
P.O. Box 6330  
Corpus Christi, TX 78466-6330

American Medical Group Carlsbad  
2410 N. Fowler  
Hobbs, NM 88240-2312

Atmos Energy  
P.O. Box 790311  
St. Louis, MO 63179-0311

Ber Mar Rewind, Ltd.  
9609 109 Street Grand Prairie  
AB T8V 4E3 Canada

Big Dog - Rig Movers  
7500 W. Hwy. 80  
Midland, TX 79706-2856

Cain Electrical Supply  
P.O. Box 16489  
Fort Worth, TX 76162-0489

Carlsbad Irrigation District  
5117 Grandi Road  
Carlsbad, NM 88220-8931

Chamberlain Enterprises, LLC  
205 Raymond St.  
Carlsbad, NM 88220-9696

City of Carlsbad  
P.O. Box 1569  
Carlsbad, NM 88221-1569

City of Midland  
P.O. Box 1152  
Midland, TX 79702-1152

Crain, Caton & James  
17th Fl., 1401 McKinney St.  
Houston, TX 77010-4035

DNOW, LP  
P.O. Box 40985  
Houston, TX 77240-0985

Darin Merle Harding  
5655 Bear Lane, #100  
Corpus Christi, TX 78405-4407

DirectV  
P.O. Box 105249  
Atlanta, GA 30348-5249

Eddy County Treasurer  
101 W. Greene, Suite 117  
Carlsbad, NM 88220-6258

First Insurance Funding Corp.  
P.O. Box 66468  
Chicago, IL 60666-0468

First National Bank of Beeville  
1400 E. Houston St.  
Beeville, TX 78102-5380

Fluid Audience, Inc.  
102-10001-101 Avenue Grande Prairie  
AB T8V 0X9 Canada

Forrest Tire, Inc.  
P.O. Box 1778  
Carlsbad, NM 88221-1778

Frost Bank  
c/o Robert L. Barrows  
Warren, Drugan & Barrows, P.C.  
800 Broadway  
San Antonio, TX 78215-1517

Frost National Bank  
100 W. Houston Street  
San Antonio, TX 78205-1400

Gabriel Jaime  
3509 Hickory Tree Rd.  
Bach Springs, TX 75180-2205

Gary Sweetman  
226 Augusta Drive  
Portland, TX 78374-4001

Harvey Fuels, Inc.  
P.O. Box 8026  
Ruidoso, NM 88355-8026

Industrial Electric Motors, Inc.  
P.O. Box 926  
Carlsbad, NM 88221-0926

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Kirby-Smith Machinery, Inc.  
P.O. Box 270360  
Oklahoma City, OK 73137-0360

Komatsu Southwest  
P.O. Box 842326  
Dallas, TX 75284-2326

LG Pest Control, LLC  
2612 Mountain View  
Carlsbad, NM 88220-3260

L ayer One Networks, LLC  
5705 Gollihar Rd., #1  
Corpus Christi, TX 78412-3109

Leaf Capital Funding, LLC  
P.O. Box 742647  
Cincinnati, OH 45274-2647

Linebarger Goggan Blair & Sampson  
David G. Aelvoet  
711 Navarro, Suite 300  
San Antonio, TX 78205-1749

Magnum Oil Tools International, Ltd.  
5655 Bear Lane, Suite 100  
Corpus Christi, TX 78405-4407

Midland Central Appraisal District  
4631 Andrews Hwy.  
P.O. Box 908002  
Midland, TX 79708-0002

Mike Valdez  
P.O. Box 344  
Loving, NM 88256-0344

Mobile Safety and Consultation, LLC  
P.O. Box 1813  
Carlsbad, NM 88221-1813

Munsch Hardt Kopf & Harr, PC  
500 N. Akard St.  
Dallas, TX 75201-3302

National Truck Services Group  
2300 N. Main Suite 7  
Clovis, NM 88101-3575

Nichols Printing, Inc.  
P.O. Box 608  
212 West Lea St.  
Carlsbad, NM 88220-5669

North Texas Tollway Authority  
P.O. Box 660244  
Dallas, TX 75266-0244

Nueces County  
c/o Diane W. Sanders  
Linebarger Goggan Blair & Sampson, LLP  
P.O. Box 17428  
Austin, TX 78760-7428

Nueces County Tax Collector  
Kevin Kieschink  
P.O. Box 2810  
Corpus Christi, Texas 78403-2810

Otis Mutual Domestic Water  
P.O. Box 5069  
Carlsbad, NM 88221-5069

Pactec, Inc.  
P.O. Box 8069  
Clinton, LA 70722-1069

Prince Parker & Associates, Inc.  
P.O. Box 474690  
Charlotte, NC 28247-4690

Professional Communications  
P.O. Box 61830  
Midland, TX 79711-1830

RK Pump & Supply  
11400 West County Rd. 30  
Midland, TX 79707-7501

Reliant  
P.O. Box 650475  
Dallas, TX 75265-0475

SLS Litigation Services, LLC  
4008 Louetta Rd., Suite 233  
Spring, TX 77388-4405

Sentrimax Centrifuges, Inc.  
108 Sentry Drive  
Mansfield, TX 76063-3608

Stang Automation, Inc.  
100 Pointe Marcelle Beaumont  
Alberta T4X 0G2 Canada

Systemseven Services  
8240 N. MoPac Expwy, #350  
Austin, TX 78759-8894

TKH Services  
P.O. Box 3053  
Carlsbad, NM 88221-3053

Teletrac Corporation  
7391 Lincoln Way  
Garden Grove, CA 92841-1428

Texas Mutual Insurance Co.  
P.O. Box 841843  
Dallas, TX 75284-1834

The Water Works  
313 South Canal  
Carlsbad, NM 88220-5656

Tranbarger & Company, LLP  
802 N. Carancahua, Suite 1660  
Corpus Christi, TX 78401-0030

Tucker, Albin & Associates, Inc.  
1702 N. Collins Blvd., Suite 100  
Richardson, TX 75080-3662

United Fire Group  
P.O. Box 3244  
Cedar Rapids, IA 52406-3244

United Healthcare  
Dept. CH 1051  
Palatine, IL 60055-0151

United States Attorney  
Taxpayer Division  
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San Antonio, TX 78216-5512

United States Attorney General  
950 Pennsylvania Ave., NW  
Washington, DC 20530-0001

United States Trustee - SA12  
JS Trustee's Office  
515 E Houston, Suite 533  
PO Box 1539  
San Antonio, TX 78295-1539

UnitedHealthcare  
Attn: CDM - Bankruptcy  
185 Asylum Street - 03B  
Hartford, CT 06103-3408

Warren Lynn Frazier  
713 Snug Harbor  
Corpus Christi, TX 78402-1700

Web Listings, Inc.  
1623 Military Rd., #926  
Niagara Falls, NY 14304-1745

Williams Scotsman, Inc.  
P.O. Box 91975  
Chicago, ILL 60693-1975

Windstream  
P.O. Box 9001908  
Louisville, KY 40290-1908

Xcel Energy  
P.O. Box 9477  
Minneapolis, MN 55484-9477

xxxx  
111 E. 17th Street  
Austin, TX 78774-0210

xxxx  
P.O. Box 25128  
Santa Fe, NM 87504-5128

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San Antonio, TX 78212-3141

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